

**REMARKS**

By this amendment, claims 1- 8 have been amended. Accordingly, claims 1-8 are currently pending in the application, of which claim 1 is independent claims.

In view of the above amendments and the following Remarks, Applicant respectfully requests reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

***Drawing Objection***

In the Office Action, the drawings were objected to because Figs. 1A to 1D illustrate only that which is old but are not designated by a legend such as --Prior Art--. This objection is respectfully traversed.

In this response, Figs. 1A to 1D has been amended to designate with --Prior Art--, as shown in the attached drawing sheets. Accordingly, Applicant respectfully requests withdrawal of the drawing objection.

***Rejections Under 35 U.S.C. §112, second paragraph***

Claims 7 and 8 stand rejected under 35 U.S.C. §112, second paragraph as being indefinite. Applicant respectfully traverses this rejection for at least the following reasons.

In this response, claim 7 has been amended to replace “the photosensitive film” with --the black matrix”, which is recited in claim 6. An example of this claimed feature is shown in Fig. 3E of the present application, in which the second common electrode 42 is formed on the black matrix 60.

With respect to claim 8, the Examiner stated “In claim 8, line 3, “each color filter” is [recited], however claim 1, from which this claim depends only recites a color filter” (Office Action, page 2). In this response, independent claim 1 has been amended to clarify that there are “*a plurality of color filters*”.

Applicant respectfully submits that claims 7 and 8, as amended, fully comply with the requirements of 35 U.S.C. §112, second paragraph. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §112, second paragraph rejection of claims 7 and 8.

***Rejections Under 35 U.S.C. §102***

Claims 1 and 8 stand rejected under 35 U.S.C. §102(b) as being anticipated by U. S. Patent No. 6,099,993 issued to Kim, *et al.* (“Kim”). Applicants respectfully traverses this rejection for at least the following reasons.

Independent claim 1 recites:

“1. A color filter substrate for a liquid crystal display, comprising:  
a transparent substrate;  
a plurality of color filters formed on the transparent substrate, *each color having a groove formed therein*;  
a first transparent conductive layer covering the color filter;  
and  
*a black matrix formed on the first transparent conductive layer within the groove.*”

An example of claim 1 is shown in Fig. 2C of the present application, in which the groove is formed in a color filter 30. Claim 1 recites that “each color having a groove formed therein”. Thus, the groove mentioned in claim 1 is different from a gap between two neighboring color filters.

In this regard, Kim shows color filters 103R, 103G and 103B that are red, green and blue color filters, respectively. As shown in Fig. 12g, there are gaps between these color filters and black matrix 105a, 115a and 15b are formed in the gap between the color filters 103R, 103G and 103B. However, Kim does not show a groove formed in any of the color filters 103R, 103G and 103B. Thus, it is submitted that Kim fails to disclose or suggest “each color having a groove formed therein”.

For this reason, it is submitted that claim 1 is patentable over Kim. Claim 8 that is dependent from claim 1 would be also patentable at least for the same reason. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §102(b) rejection of claims 1 and 8.

In the Office Action, claims 1, 2, 6 and 8 stand rejected under 35 U.S.C. §102(e) as being anticipated by U. S. Patent No. 6,208,394 issued to Tanaka, et al. (“Tanaka”). This rejection is respectfully traversed.

As previously mentioned, claim 1 recites “each color having a groove formed therein” and the groove mentioned in claim 1 is different from a gap between two neighboring color filters. In this regard, the Examiner stated “Tanaka et al. teaches the invention substantially as recited ...” (Office Action, page 4). However, in Fig. 2E of Tanaka, the black matrix 204 is formed in the gap between two different color filters. None of the color filters 205, 206 and 207 has “a groove formed therein”.

For this reason, it is submitted that claim 1 is patentable over Kim. Claims 2, 6 and 8 that are dependent from claim 1 would be also patentable at least for the same reason. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §102(b) rejection of claims 1, 2, 6 and 8.

***Rejections Under 35 U.S.C. §103***

Claims 3, 4, 5 and 7 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tanaka in view of Applicant's Admitted Prior Art (AAPA). This rejection is respectfully traversed.

Claims 3, 4, 5 and 7 are dependent from claim 8. As previously mentioned, claim 1 is believed to be patentable over Tanaka. For example, Tanaka fails to disclose or suggest a groove formed in a color filter.

AAPA shows that the black matrix 20 is first formed on the substrate and two different color filters 30 are formed on the right and left side of the black matrix. AAPA may show a black matrix formed in a gap between two neighboring color filters, but does not disclose a groove formed in a color filter.

Since none of the cited references discloses or suggests a groove formed in a color filter, it is respectfully submitted that claim 1 is patentable over Tanaka and AAPA. Claims 3, 4, 5 and 7 that are dependent from claim 1 would be also patentable at least for the same reason. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §102(b) rejection of claims 3, 4, 5 and 7.

***Other Matters***

In this response, claims 1-8 have been amended solely for clarification and correction purposes. This amendment is not made for the purpose of avoiding prior art or narrowing the claimed invention since the invention defined in claims 1-8 are patentable over the cited references, as explained above. Therefore, Applicant does not intend to relinquish any subject matter by these amendments.

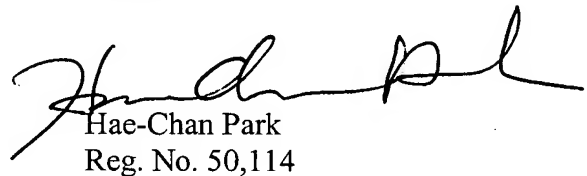
**CONCLUSION**

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submit that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,



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Date: January 22, 2004

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ATTACHMENT: Replacement Sheet for Figs. 1A to 1D

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